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CONFIDENTIAL

United States Environmental Protection Agency

Region 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

25 March 2008

Reply To
Attn Of: Coeur d'Alene Field Office
1910 Northwest Boulevard, Suite 208
Coeur d'Alene, Idaho 83814

MEMORANDUM

SUBJECT: Request to Conduct an Engineering Evaluation/Cost Analysis for the Avery Landing Site, Shoshone County, Idaho

FROM: Earl Liverman, On-Scene Coordinator

THRU: Chris D. Field, Unit Manager
Emergency Response Unit, Office of Environmental Cleanup

TO: Daniel D. Opalski, Director
Office of Environmental Cleanup

I. PURPOSE

The purpose of this memorandum is to request and document approval to conduct an engineering evaluation/cost analysis (EE/CA) for a non-time critical removal action proposed for the Avery Landing Site (Site), Shoshone County, Idaho.

The proposed EE/CA is expected to be a potentially responsible party (PRP) lead action. The PRPs are Potlatch Corporation and Potlatch Forest Products Corporation hereinafter referred to as the Respondents in this Approval Memorandum. The EE/CA document and other actions required in compliance with any settlement agreement will be conducted with oversight by the U.S. Environmental Protection Agency (EPA) to ensure that the Respondent actions are conducted in accordance with applicable laws, regulations, and EPA policy.

This action meets the criteria for initiating a removal action under the National Contingency Plan (NCP), 40 CFR §300.415.

II. BACKGROUND

The CERCLIS ID No. is IDD984666313 and the Site ID No. is 10FT.

A. Site Location

The Site is located in the St. Joe River valley in the Bitterroot Mountains in northern Idaho, one mile west of the town of Avery, Shoshone County, Idaho (refer to Figures 2-1 and 2-2). The Site is located directly adjacent to the St. Joe River to the south and Highway 50 to the north, at 47°13' 57" North latitude and 115°43'40" West longitude.

The St. Joe River is designated a special resource water that is used for wildlife habitat, recreation, and as drinking water for downstream residents. According to the Idaho Administrative Procedures Act (IDAPA) 58.01.02.110.11, the segment of the St. Joe River adjacent to the Site that could be impacted by contaminants found at the Site has the following designations: special resource water, domestic water supply, primary contact recreation, cold water communities, and salmonoid spawning. The Site is located in a narrow and remote river valley, and the immediate area around the Site is residential, recreational, and commercial.

B. Site Description

The Site was used as a switching and maintenance facility for the Chicago, Milwaukee, St. Paul, and Pacific Railroad (CMSPR) from 1909 to 1977. Activities performed by the railroad at the facility included maintenance, refueling, and cleaning. On-site structures in support of these activities included a boiler house, coal dock, engine house, fan house, machine shop, oil tanks, pump house, roundhouse, storehouses, and a turntable. As a refueling station, fuel oil was stored on-site, including the use of a 500,000-gallon above ground fuel oil tank.

C. Site Ownership

CMSPR owned and operated the Site from 1907 to 1977. In 1977, CMSPR filed for bankruptcy. In 1980, Potlatch Corporation purchased the western portion of the property (Figure 2-3) from the Milwaukee Road Bankruptcy Trustee. In 1985, CMPSR reorganized under the name CMC Real Estate Company (CMC). The eastern portion of the property reverted back to the heir of the previous owner, before CMPSR began operations, David Therault. In 1996, Thierault sold the property to Larry and Margie Bentcik, who currently own the property. Another portion of the property was acquired by the Federal Highway Administration for use in the construction/expansion of State Highway 50. The Site has been used by Potlatch since 1980 for parking, staging, and temporary log storage. Potlatch Corporation leased part of the property from 1973 until 1980.

III. NATURE AND EXTENT OF CONTAMINATION

EPA conducted a removal assessment at the Site during April 2007.[1] The assessment results are summarized below.

Throughout the Site there is a large zone of free petroleum product contamination in the groundwater and in subsurface soils at levels that exceed Idaho regulatory standards. Free product was observed floating on groundwater in monitoring and recovery wells, saturated in subsurface soils collected from soil borings, and seeping into the St. Joe River along approximately 200 feet of river bank. The earliest documented release of petroleum product from the Site seeping into the St. Joe River was reported in June 1970. Thereafter, seeps have been observed with the most recent occurring in the Fall of 2007.

Organic and inorganic hazardous substances were detected in most of the Site samples, particularly polycyclic aromatic hydrocarbons (PAHs) compounds in subsurface soils and groundwater samples that exceeded applicable state and federal risk-based guidelines.

In one or more soil samples, benzo[a]anthracene, benzo[b]fluoranthene, and benzo[a]pyrene exceeded their respective EPA Human Health Medium-Specific Screening Levels ("HHMSSL"); and benzo[a]anthracene, benzo[b]fluoranthene, benzo[a]pyrene, naphthalene, 2-methylnaphthalene, and 4-nitroaniline exceeded their respective State of Idaho Risk Evaluation Manual ("REM") guidelines. Arsenic also exceeded its respective HHMSSL in one soil sample, and arsenic, iron, lead, manganese, and mercury exceeded their respective REM guidelines in several soil samples.

In one or more groundwater samples, benzo[a]anthracene, benzo[b]fluoranthene, benzo[g,h,i]perylene, benzo[a]pyrene, chrysene, and naphthalene exceeded their respective HHMSSLs for tap water, and benzo[a]anthracene, benzo[b]fluoranthene, benzo[a]pyrene, N-nitrosodiphenyl amine, and 2-methylnaphthalene exceeded their respective REM guidelines. Aluminum, arsenic, iron, lead, and manganese exceeded their HHMSL for tap water and/or the drinking water Maximum Contaminant Level ("MCL"); and arsenic, iron, lead, and manganese exceeded their respective REM guidelines. In addition, the PCB Aroclor-1260 exceeded its respective REM guideline in one groundwater monitoring well.

For surface water, benzo[a]pyrene exceeded its Ambient Water Quality Criteria standard, while benzo[a]anthracene, benzo[b]fluoranthene, benzo[a]pyrene, and chrysene exceeded their respective REM guidelines. Aluminum, arsenic, iron, lead, and manganese exceeded their respective REM guidelines.

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[1]Ecology and Environment, Inc. (E & E). *Removal Assessment Report: Avery Landing Site, Avery, Idaho* (31 July 2007). Contract Number EP-S7-06-02, Technical Direction Document 07-03-0004, Seattle, Washington.

IV. THREAT TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT

Substances found in the Site, including the substances identified above in the Nature and Extent of Contamination, constitute "hazardous substances" as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14). Total petroleum hydrocarbons at the Site, also identified in the Nature and Extent of Contamination above, are from discharges of oil, as defined in Sections 311(a)(1) and (2) of the CWA, 33 U.S.C. 1321(a)(1) and (2), and Sections 1001(23) and (7) of OPA, 33 U.S.C. 2701(23) and (7).

A. Human Health and the Environment

The elevated concentrations of hazardous substances and total petroleum hydrocarbons indicate that air (inhalation), direct contact (dermal), and soil (ingestion) human exposure pathways exist. Nearby residents, recreationists, and/or trespassers could be exposed to the contaminants. The potential for exposure is elevated further because Site access is unrestricted and limited vegetative cover may result in the redistribution of contaminants throughout the surrounding environment. Moreover, there exists Site-related chronic petroleum product releases to the St. Joe River and shoreline.

Ecological receptors, including avian, mammalian, and plant receptors, could become exposed to elevated site contaminants and petroleum product found in soils through direct contact with the contaminated materials and with water and sediments contaminated by the materials; ingestion of soils, water, and sediments contaminated by the materials; and ingestion of contaminated food (e.g., sediment- or soil-dwelling insects, vegetation).

B. Expected Change If No Action Is Taken

If no action is taken, or if this action is delayed:

- hazardous substances will remain as potential human health and environmental threats based on inhalation, direct contact, and ingestion pathways;

- hazardous substances will remain a potential continuing source of solid and dissolved-phase contaminants; and

- petroleum product will likely continue to seep into the St. Joe River.

V. ENDANGERMENT DETERMINATION

The actual or threatened release of hazardous substances within and from the Site may present an imminent and substantial endangerment to the public health, welfare, or the environment within the meaning of Section 106(a) of CERCLA, 42 U.S.C. § 9606(a). The presence of actual or threatened discharges of oil at the Site from vessels and/or

facilities in violation of Section 311(b) of the CWA, 33 U.S.C. 1321(b), may be an imminent and substantial threat to the public health or welfare of the United States, including fish, shellfish, wildlife, public and private property, shorelines, beaches, habitat, and/or other living and nonliving natural resources under the jurisdiction or control of the United States.

VI. PROPOSED PROJECT/OVERSIGHT AND COSTS

The EE/CA will assist with defining the scope of the removal action. Based on the analysis of the nature and extent of contamination and on the cleanup objectives developed as part of the EE/CA, a limited number of removal action alternatives will be identified and evaluated against the scope of the removal action and against each specific objective. The technology alternatives that will be subject to detailed analysis include contaminant containment, thermal desorption, *in-situ* and *ex-situ* solidification/stabilization, land application, and off-site disposal. Bench-scale treatability investigations will be conducted to provide sufficient data to allow the alternatives to be fully developed and evaluated, and to reduce cost and performance uncertainties so that a removal alternative can be selected. A final removal alternative will be selected following public comment and evaluation. Costs for conducting the EE/CA are expected to be paid or reimbursed by the Respondents. Estimated EE/CA costs are ± $250,000, including EPA oversight.

VII. RECOMMENDATION

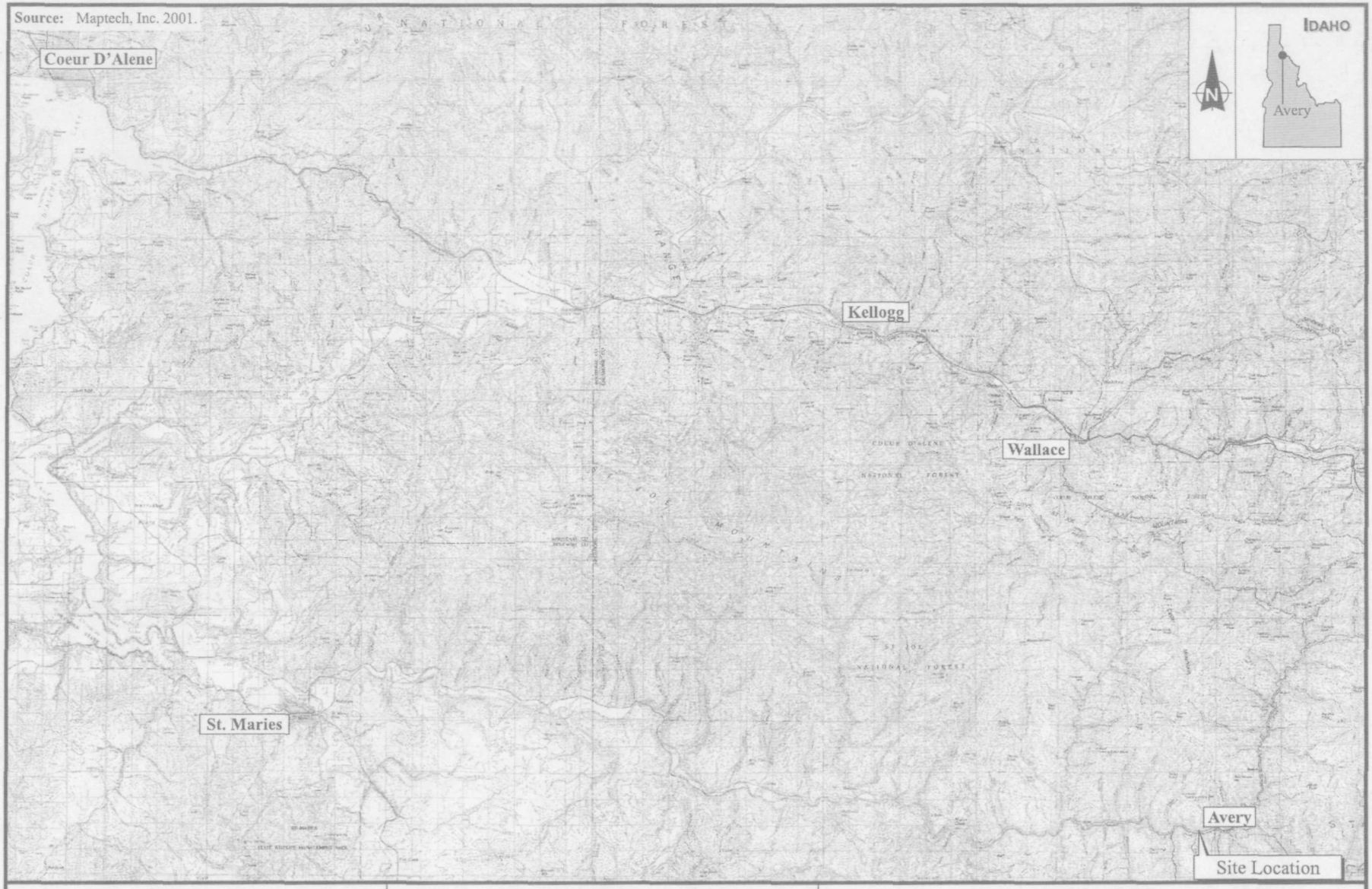
Conditions at the Avery Landing Site meet the criteria in the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300.415, and I recommend your approval to conduct an EE/CA.

Approval: X Disapproval: _____

Signature: _____

Date: 4/1/08

(b) (5)



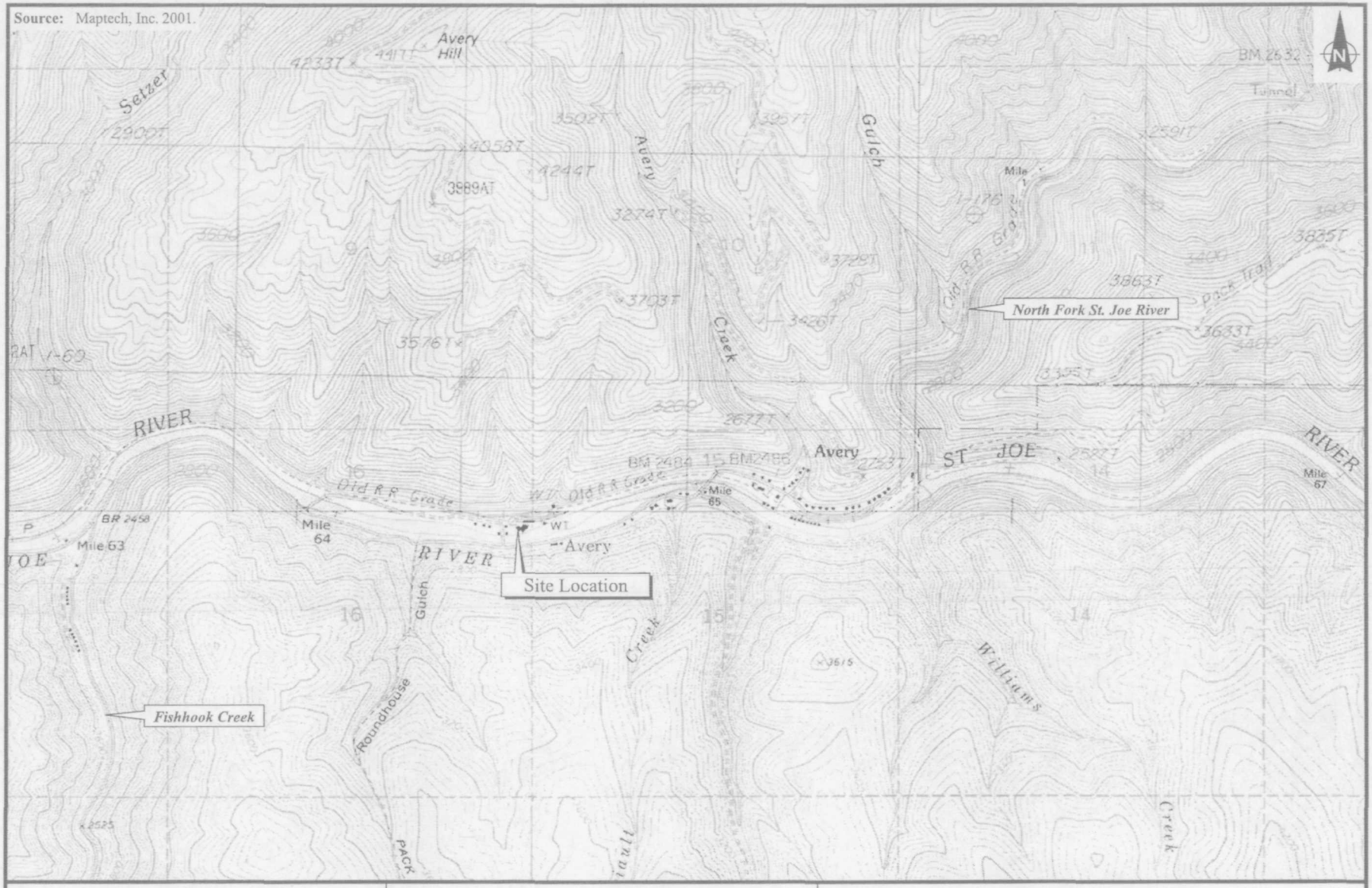
ecology and environment, inc.
International Specialists in the Environment
Seattle, Washington

AVERY LANDING SITE
Avery, Idaho

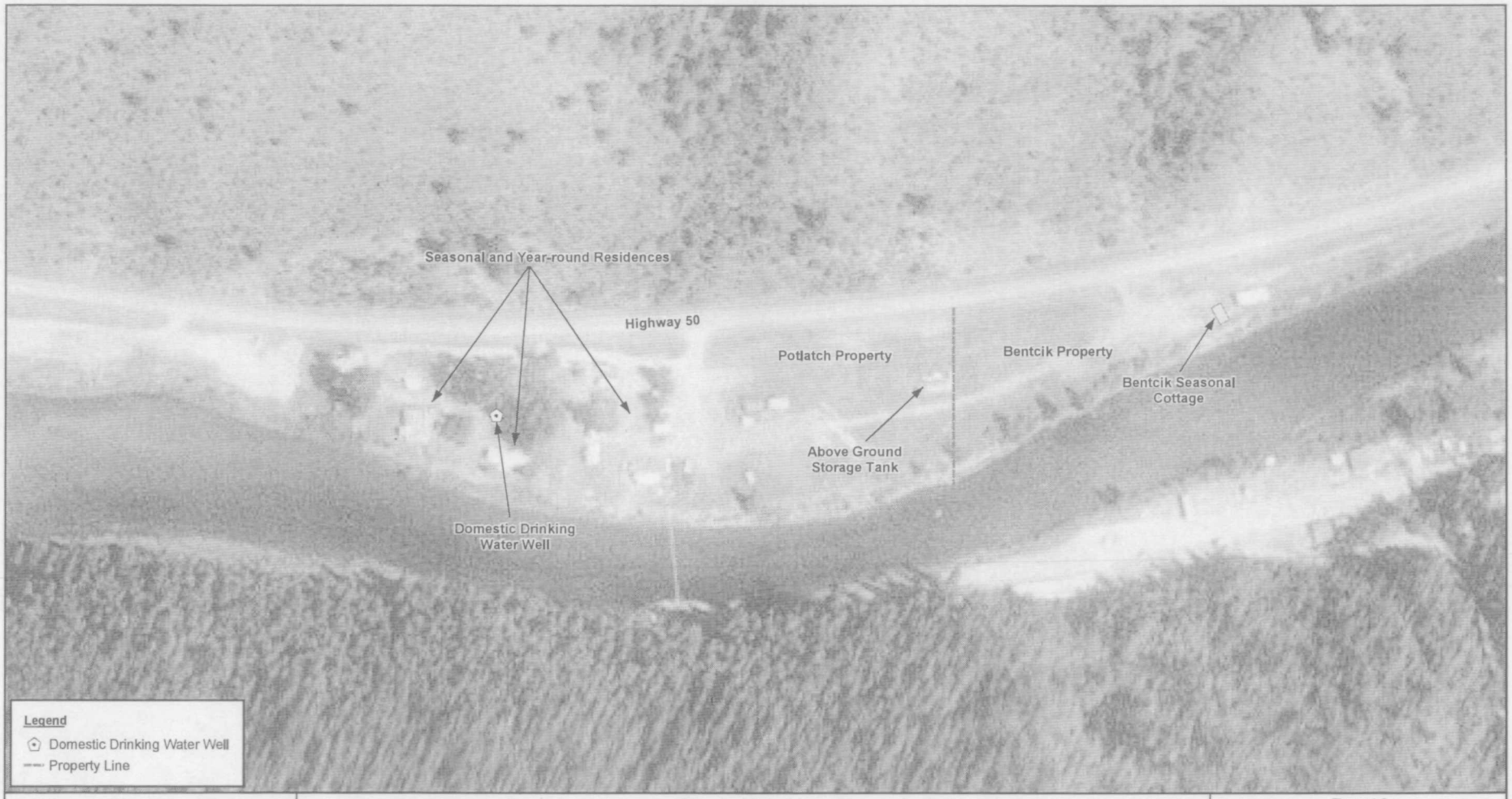
0 4 8
Approximate Scale in Miles

Figure 1-1
SITE LOCATION MAP

Date:	Drawn by:	
2/22/08	AES	10:START-3\07030004\fig 1-1



ecology and environment, inc. International Specialists in the Environment Seattle, Washington	AVERY LANDING SITE Avery, Idaho	Figure 1-2 SITE VICINITY MAP		
	0 1000 2000 Approximate Scale in Feet	Date: 2/22/08	Drawn by: AES	10:START-3\07030004\fig 1-2



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AVERY LANDING SITE

Avery, Idaho

Figure 1-3

Site Layout Map

Map Source Information:
Terraserver, USGS Aerial Photo

Date:
2/21/2008

GIS Analyst:
avh

Project ID:
002233.0193.01SF

\edms-projects\avery_landing\figure 1-3 site layout map.mxd

CONCURRENCE SHEET
AVERY LANDING APPROVAL (EE/CA) MEMORANDUM

NAME	INITIALS	DATE
Janet Magnuson	JM	April 1, 2008
Cyndy Mackey	CM	April 1, 2008

SIGN-OFF SHEET
AVERY LANDING APPROVAL (EE/CA) MEMORANDUM

COORDINATION	Y/N	CONTACT INFORMATION OR COMMENT
Acct No./CERCLIS NO.	N	Not required b/c already exists
Admn Record established	Y	Craig Conant
ATSDR	N	N/A
Community Involvement/Press Coordination	Y	Kathy Smith
Contracts (START & ERRS)	N	N/A
Dept of Agriculture (USFS)	N	N/A
Dept of Commerce/National Marine Fisheries	N	N/A
Dept of Interior (ESA) issues considered	Y	Suzanne Audet (USFWS)
Hanford Project Office coordination	N	N/A
IGCE completed, if required	N	N/A
NPL Coordination	Y	Monica Tonel
ORC coordination/concurrence	Y	Janet Magnuson
PRP Search initiated	Y	Gretchen Schmidt
PRSC	N	N/A
State	Y	Geoff Harvey (IDEQ)
State Operations Office coordination	Y	IOO
Tribal Office	N	N/A
Tribal (cultural & natural resources) issues considered	Y	Cd'A Tribe staff coordination

Original to: Records Center (Admn Record)
Copies to: Lynne Kershner (CERCLIS Reporting), Mary Matthews